

student's parent/guardian, for their minor son; and M.K. a minor student, and S.K, the student's parent/guardian, for her minor daughter, and submit this list of potential witnesses in support of preliminary injunction:

1. **Ashley Paquette**—Ms. Paquette is a 5th grade teacher at Farrugut Intermediate School who has a medical condition which makes her more susceptible to serious illness or death from contracting COVID-19. She is expected to testify consistent with her declaration to the conditions within her elementary school within Knox County Schools and to the level of masking and low level of non-masking within her classes and school.
2. **Dr. Jason Yaun**—Dr. Yaun is an Associate Professor in the Department of Pediatrics for the University of Tennessee Health Science Center and is a licensed and board certified pediatrician with UT Le Bonheur Pediatric Specialists in Memphis, Tennessee. His CV is attached hereto as **Exhibit A**. Dr. Yaun is expected to testify to the increased risk of COVID-19 in children with pre-existing health conditions which put them at greater risk of developing severe COVID-19 symptoms or death. He is further expected to testify to how modifications in practices, such as requiring uniform masking, significantly reduces the risk of contracting and spreading COVID-19.
3. **Dr. Jennifer Patton Ker, M.D.**—Dr. Ker is an Assistant Clinical Professor in the Division of Allergy, Pulmonary, and Critical Care Medicine at Vanderbilt University Medical Center and is licensed and board certified in Allergy and Immunology. Her CV is attached hereto as **Exhibit B**. It is expected that Dr. Ker will testify to the increased transmissibility of the Delta variant of COVID-19 and especially the recent increase in cases and deaths among adolescents. She is further expected to testify about how mask mandates reduce such

transmissibility and how permitting opt-outs contradict that purpose and increase the spread.

4. L.H.—L.H. is the mother of S.B., a minor within Knox County Schools who has a disability which makes him immunocompromised. It is anticipated that she will testify consistent with her declaration about her son's experience within Knox County Schools without a mask mandate this year and her request that Knox County Schools follow the CDC's recommendations requiring adherence to wearing face masks in school.
5. K.P. is the mother of M.S., a minor within Knox County Schools who is more likely to suffer serious illness from COVID-19 given the significance of her disabilities. K.P. is expected to testify consistent with her declaration about her concerns and how K.P. would return to school if appropriate masking of all persons were in place.
6. M.W. is the mother of T.W., a minor within Knox County Schools who has a disability which makes him more susceptible to suffer serious illness from contracting COVID-19. M.W. is expected to testify consistent with her declaration that his attendance at school without a mask mandate places him more at risk and how she requests that Knox County Schools follow the CDC's recommendations requiring adherence to wearing face masks in school.
7. S.K., is the mother of M.K, a minor within Knox County Schools who has a disability which affects her breathing. S.K. is expected to testify consistent with her declaration about her daughter's attendance in Knox County Schools last year with a mask mandate in place and how this year she has requested the accommodation of continued adherence to the CDC's recommendations to wearing masks, but has not had that request granted.

Respectfully submitted,

GILBERT LAW, PLC

/s/ Justin S. Gilbert

Justin S. Gilbert (TN Bar No. 017079)
100 W. Martin Luther King Blvd, Suite 501
Chattanooga, TN 37402
Telephone: 423.756.8203
Facsimile: 423.756.2233
justin@schoolandworklaw.com
&

THE SALONUS FIRM, PLC

/s/ Jessica F. Salonus

JESSICA F. SALONUS (28158)
139 Stonebridge Boulevard
Jackson, Tennessee 38305
Telephone: (731) 300-0970
Facsimile: 731.256.5711
jsalonus@salonusfirm.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically via the Court's ecf filing system on September 14, 2021, and will be sent by operation of the Court's electronic filing system to all parties registered through the Court's electronic filing system.

Jessica F. Salonus